

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE GEISINGER SYSTEM
SERVICES AND EVANGELICAL
COMMUNITY HOSPITAL
HEALTHCARE WORKERS
ANTITRUST LITIGATION

No. 4:21-cv-00196

Chief Judge Matthew W. Brann

NOTICE OF SETTLEMENT & REQUEST FOR STAY OF LITIGATION

Plaintiffs Nichole Leib and Kevin Brokenshire on behalf of themselves and the Settlement Class (“Plaintiffs”) and Geisinger System Services, Inc. (“Geisinger”) are pleased to inform the Court that they have reached a settlement in principle to resolve this case. In combination with the proposed Evangelical settlement, Plaintiffs’ settlement with Geisinger will entirely resolve and conclude this litigation, subject to approval by the Court pursuant to Federal Rule of Civil Procedure 23(e)(2).

Plaintiffs and Geisinger will execute a longer form settlement agreement that can be presented to the Court promptly for purposes of preliminary approval and directing settlement notice to the class consistent with Federal Rule of Civil Procedure 23. The parties request that the Court stay this action and litigation, pending Court approval of the Geisinger and Evangelical settlements.

Dated: March 28, 2025

/s/ Adam J. Zapala

Adam J. Zapala (*Pro Hac Vice*)
Elizabeth T. Castillo (*Pro Hac Vice*)
Christian S. Ruano (*Pro Hac Vice*)
COTCHETT, PITRE &
McCARTHY, LLP
840 Malcolm Road
Burlingame, CA 94010
Phone: (650) 697-6000
Fax: (650) 697-0577
azapala@cpmlegal.com
ecastillo@cpmlegal.com
cruano@cpmlegal.com

/s/ Eric L. Cramer

Eric L. Cramer (PA Bar No. 69289)
Michael J. Kane (PA Bar No. 73998)
Michaela L. Wallin (*Pro Hac Vice*)
J. Taylor Hollinger (PA Bar No.
332706)
BERGER MONTAGUE PC
1818 Market Street, Suite 3600
Philadelphia, PA 19103
Phone: (215) 875-4604
Fax: (215) 875-5707
ecramer@bm.net
scarson@bm.net
cenders@bm.net
mkane@bm.net
mwallin@bm.net
thollinger@bm.net

Daniel J. Walker (*Pro Hac Vice*)
BERGER MONTAGUE PC
1001 G Street, NW
Suite 400 East
Washington, DC 20001
Phone: (202) 559-9745

Respectfully submitted,

/s/Stefan M. Meisner

Stefan M. Meisner (*pro hac vice*)
CROWELL & MORING LLP
1001 Pennsylvania Avenue NW
Washington, DC 20004
Phone: (202) 624-2500
smeisner@crowell.com

Chahira Solh (*Pro Hac Vice*)

CROWELL & MORING LLP
3 Park Plaza, Ste. 20th Floor
Irvine, CA 92614
Phone: (949) 798-1367
csolh@crowell.com

Rosa M. Morales (*Pro Hac Vice*)

CROWELL & MORING LLP
Two Manhattan West
375 Ninth Avenue
New York, NY 10001
Phone: (212) 895-4261
rmorales@crowell.com

Daniel T. Brier

Donna A. Walsh

Richard L. Armezzani

MYERS BRIER & KELLY LLP
425 Spruce Street, Suite 200
Scranton, PA 18503
Phone: (570) 342-6100
dbrier@mbklaw.com
dwalsh@mbklaw.com
rarmezzani@mbklaw.com

*Attorneys for Defendant Geisinger
System Services, Inc.*

dwalker@bm

Interim Co-Lead Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I, Adam J. Zapala, hereby certify that on March 28, 2025, I caused a true and correct copy of the foregoing Notice of Settlement to be served by ECF Notification upon all counsel of record.

/s/ Adam J. Zapala
Adam J. Zapala